

KENNETH C. JOHNSTON, ESQ.  
Texas Bar No. 00792608  
E-mail: [kjohnston@krcl.com](mailto:kjohnston@krcl.com)  
BRIAN W. CLARK, ESQ.  
Texas Bar No. 24032075  
E-mail: [bclark@krcl.com](mailto:bclark@krcl.com)  
DAVID M. CLEM, ESQ.  
Texas Bar No. 24050428  
E-mail: [dclem@krcl.com](mailto:dclem@krcl.com)  
KANE RUSSELL COLEMAN & LOGAN PC  
3700 Thanksgiving Tower  
1601 Elm Street  
Dallas, Texas 75201  
Telephone: 214/777-4200  
Facsimile: 214/777-4299

F. THOMAS EDWARDS, ESQ.  
Nevada Bar No. 9549  
E-mail: [tedwards@nevadafirm.com](mailto:tedwards@nevadafirm.com)  
SARAH T. BASSETT, ESQ.  
Nevada Bar No. 12326  
E-mail: [sbassett@nevadafirm.com](mailto:sbassett@nevadafirm.com)  
HOLLEY, DRIGGS, WALCH,  
PUZEY & THOMPSON  
400 South Fourth Street, Third Floor  
Las Vegas, Nevada 89101  
Telephone: 702/791-0308  
Facsimile: 702/791-1912

*Attorneys for Plaintiff  
Blue Acquisition Member, LLC*

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

BLUE ACQUISITION MEMBER, LLC,

Plaintiff,

v.

BAILEY PEAVY BAILEY, PLLC,

Defendant.

CASE NO. 2:14-cv-02013- GMN-NJK

**STIPULATION AND  
ORDER EXTENDING TIME TO  
RESPOND TO MOTION TO DISMISS,  
TRANSFER OR STAY**

**(First Request)**

Plaintiff Blue Acquisition Member, LLC (“Plaintiff”), by and through its undersigned counsel, and Defendant Bailey Peavy Bailey, PLLC (“Defendant”), by and through its undersigned counsel, and hereby state as follows:

1           1.       On April 24, 2015, Defendant filed its Motion to Dismiss for Lack of Personal  
2       Jurisdiction or Alternatively Motion to Transfer Venue or Enter a Stay (Dkt. No. 32) (the  
3       “Motion”).

4           2.       The response to the Motion is currently due May 11, 2015.

5           3.       Counsel for Plaintiff responsible for preparing the response to the Motion has  
6       been in trial, such that counsel for Plaintiff requested and counsel for Defendant agreed to a one-  
7       week extension to allow Plaintiff to respond to the Motion.

8           In light of the foregoing, the Parties stipulate and agree, subject to this Court’s approval,  
9       as follows:

10          1.       That the time for Plaintiff to respond to the Motion shall be extended;

11          2.       Plaintiff shall respond to the Motion by or before May 18, 2015.

12          Dated this 8<sup>th</sup> day of April, 2015.

13       HOLLEY, DRIGGS, WALCH, PUZEY  
14       & THOMPSON

PISANELLI BICE PLLC

15       By: /s/ F. Thomas Edwards  
16       F. Thomas Edwards, Esq., #9549  
17       Sarah T. Bassett, Esq., #12326  
18       400 South Fourth Street, Third Floor  
19       Las Vegas, Nevada 89101

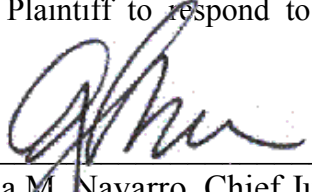
By: /s/ Jarrod L. Rickard  
James J. Pisanelli, Esq., #4027  
Debra L. Spinelli, Esq., #9695  
Jarrod L. Rickard, Esq., #10203  
400 South 7th Street, Suite 300  
Las Vegas, Nevada 89101

Attorneys for Plaintiff

Attorneys for Defendant

22                               **ORDER**

23           IT IS SO ORDERED that the time for Plaintiff to respond to the Motion shall be  
24       extended to May 18, 2015.

25                                 
26       Gloria M. Navarro, Chief Judge  
27       United States District Court

28       **DATED: 05/13/2015**

CASE NO. 2:14-cv-02013- GMN-NJK